

FILED

UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

UNITED STATES DISTRICT COURT

JUN 29 2005

FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ROSE MORRIS,

Defendant.

MATTHEW J. DYKMAN

Cr. No. 05-1378

Counts 1 - 10: 18 U.S.C. § 1159;

Misrepresentation of Indian produced
goods and products

REDACTED

INDICTMENT

The Grand Jury charges:

Count 1

On or about February 25, 2004, in the State and District of New Mexico, Defendant ROSE MORRIS, did knowingly and unlawfully offer and display for sale, and did sell, a good in a manner that falsely suggested that the good was Indian produced, and an Indian product, and the product of a particular Indian and an Indian tribe; resident within the United States. That is, the Defendant did unlawfully offer and display for sale, and did sell, a rug which the Defendant knowingly and falsely suggested was Indian produced, an Indian product, and the product of a particular Indian and an Indian tribe, resident within the United States.

In violation of Title 18, United States Code, Section 1159.

Count 2

On or about March 9, 2004, in the State and District of New Mexico, Defendant ROSE MORRIS, did knowingly and unlawfully offer and display for sale, and did sell, a good in a manner that falsely suggested that the good was Indian produced, and an

Indian product, and the product of a particular Indian and an Indian tribe, resident within the United States. That is, the Defendant did unlawfully offer and display for sale, and did sell, a rug which the Defendant knowingly and falsely suggested was Indian produced, an Indian product, and the product of a particular Indian and an Indian tribe, resident within the United States.

In violation of Title 18, United States Code, Section 1159.

Count 3

On or about March 9, 2004, in the State and District of New Mexico, Defendant ROSE MORRIS, did knowingly and unlawfully offer and display for sale, and did sell, a good in a manner that falsely suggested that the good was Indian produced, and an Indian product, and the product of a particular Indian and an Indian tribe, resident within the United States. That is, the Defendant did unlawfully offer and display for sale, and did sell, a rug which the Defendant knowingly and falsely suggested was Indian produced, an Indian product, and the product of a particular Indian and an Indian tribe, resident within the United States.

In violation of Title 18, United States Code, Section 1159.

Count 4

On or about April 27, 2004, in the State and District of New Mexico, Defendant ROSE MORRIS, did knowingly and unlawfully offer and display for sale, and did sell, a good in a manner that falsely suggested that the good was Indian produced, and an Indian product, and the product of a particular Indian and an Indian tribe, resident within the United States. That is, the Defendant did unlawfully offer and display for sale, and did sell, a rug which the Defendant knowingly and falsely suggested was Indian

produced, an Indian product, and the product of a particular Indian and an Indian tribe, resident within the United States.

In violation of Title 18, United States Code, Section 1159.

Count 5

On or about May 11, 2004, in the State and District of New Mexico, Defendant ROSE MORRIS, did knowingly and unlawfully offer and display for sale, and did sell, a good in a manner that falsely suggested that the good was Indian produced, and an Indian product, and the product of a particular Indian and an Indian tribe, resident within the United States. That is, the Defendant did unlawfully offer and display for sale, and did sell, a rug which the Defendant knowingly and falsely suggested was Indian produced, an Indian product, and the product of a particular Indian and an Indian tribe, resident within the United States.

In violation of Title 18, United States Code, Section 1159.

Count 6

On or about August 4, 2004, in the State and District of New Mexico, Defendant ROSE MORRIS, did knowingly and unlawfully offer and display for sale, and did sell, a good in a manner that falsely suggested that the good was Indian produced, and an Indian product, and the product of a particular Indian and an Indian tribe, resident within the United States. That is, the Defendant did unlawfully offer and display for sale, and did sell, a rug which the Defendant knowingly and falsely suggested was Indian produced, an Indian product, and the product of a particular Indian and an Indian tribe, resident within the United States.

In violation of Title 18, United States Code, Section 1159.

Count 7

On or about August 4, 2004, in the State and District of New Mexico, Defendant ROSE MORRIS, did knowingly and unlawfully offer and display for sale, and did sell, a good in a manner that falsely suggested that the good was Indian produced, and an Indian product, and the product of a particular Indian and an Indian tribe, resident within the United States. That is, the Defendant did unlawfully offer and display for sale, and did sell, a rug which the Defendant knowingly and falsely suggested was Indian produced, an Indian product, and the product of a particular Indian and an Indian tribe, resident within the United States.

In violation of Title 18, United States Code, Section 1159.

Count 8

On or about November 8, 2004, in the State and District of New Mexico, Defendant ROSE MORRIS, did knowingly and unlawfully offer and display for sale, and did sell, a good in a manner that falsely suggested that the good was Indian produced, and an Indian product, and the product of a particular Indian and an Indian tribe, resident within the United States. That is, the Defendant did unlawfully offer and display for sale, and did sell, a rug which the Defendant knowingly and falsely suggested was Indian produced, an Indian product, and the product of a particular Indian and an Indian tribe, resident within the United States.

In violation of Title 18, United States Code, Section 1159.

Count 9

On or about November 8, 2004, in the State and District of New Mexico, Defendant ROSE MORRIS, did knowingly and unlawfully offer and display for sale, and

did sell, a good in a manner that falsely suggested that the good was Indian produced, and an Indian product, and the product of a particular Indian and an Indian tribe, resident within the United States. That is, the Defendant did unlawfully offer and display for sale, and did sell, a rug which the Defendant knowingly and falsely suggested was Indian produced, an Indian product, and the product of a particular Indian and an Indian tribe, resident within the United States.

In violation of Title 18, United States Code, Section 1159.


Count 10

On or about December 14, 2004, in the State and District of New Mexico, Defendant ROSE MORRIS, did knowingly and unlawfully offer and display for sale, and did sell, a good in a manner that falsely suggested that the good was Indian produced, and an Indian product, and the product of a particular Indian and an Indian tribe, resident within the United States. That is, the Defendant did unlawfully offer and display for sale, and did sell, a rug which the Defendant knowingly and falsely suggested was Indian produced, an Indian product, and the product of a particular Indian and an Indian tribe, resident within the United States.

In violation of Title 18, United States Code, Section 1159.

A TRUE BILL:

FOREPERSON OF THE GRAND JURY


DAVID C. IGLESIAS
United States Attorney
MLH